

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

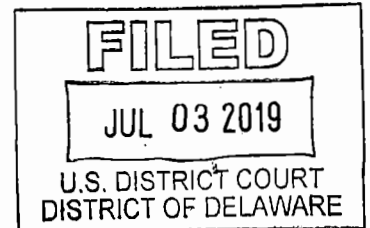
UNITED STATES OF AMERICA

v.

WILLIAM A. BROWN,

Defendant.

)  
)  
) Criminal Action No. 19- 88  
)  
)  
)



**INFORMATION**

The United States Attorney for the District of Delaware charges that:

**Background**

At all times material to this Information:

1. The Delaware Division of Vocational Rehabilitation ("DVR") is a Delaware institution that provides employment counseling and job placement services for individuals with disabilities, including those recovering from alcohol and drug addiction.
2. DVR receives approximately 80% of its annual funding from federal programs.
3. In order to provide those services, DVR contracts with various vendors, including Connections Community Support Programs, Inc. ("Connections").
4. DVR contracted with Connections to provide employment services for clients recovering from alcohol and drug addiction for several years, including 2015 and 2016.
5. The Defendant William A. Brown ("BROWN") was an employee of Connections from at least 2015 through 2018. From 2015 to 2017, he served as a job placement counselor.
6. As part of his employment, BROWN was expected to meet with clients and provide three main services:
  - a. Job development - resume help and basic life/job search services;
  - b. Job placement - help clients secure job placements; and

c. Job retention – help client achieve 90 days of continuous employment.

7. Connections and DVR developed “payment points” for these three forms of services, which were evidenced by the submission of paperwork confirming various services including Individualized Plans for Employment and employer paystubs.

8. Connections measured BROWN’s success as a job placement counselor in part on the number of clients he was able to provide services for, with the ultimate programmatic goal being ninety-day job retention by all clients. In addition, Connections received payments from DVR based on the submission of records from its employees, including BROWN.

9. After DVR received the confirmation of various services provided by Connections, generally through paperwork transmitted by BROWN, DVR sent ACH payments from DVR’s bank account held at PNC Bank to Connections’ bank account held at WSFS Bank.

**COUNT 1**  
**Wire Fraud (18 U.S.C. § 1343)**

**The Scheme**

10. From on or about September 9, 2015, to on or about November 1, 2016, in the District of Delaware and elsewhere, the defendant WILLIAM A. BROWN knowingly devised and intended to devise a scheme and artifice to defraud DVR and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

**Manner and Means**

11. It was part of the scheme and artifice that BROWN forged client signatures on paperwork, and falsified employment paystubs, so that DVR would remit payments to Connections for vocational services rendered.

**Charging Paragraph**

12. Paragraphs 1 through 11 are herein incorporated by reference.

13. On or about March 16, 2016, in the District of Delaware and elsewhere, the defendant, WILLIAM A. BROWN, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the signal and sound, to wit, an ACH payment for \$892.00 from PNC Bank in Delaware, processed through a clearing system in New York, and transmitted to WSFS Bank in Delaware, all in violation of Title 18, United States Code, Section 1343.

**NOTICE OF FORFEITURE**

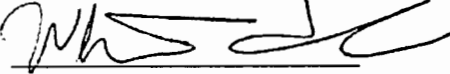
14. Upon conviction of the offense alleged in Count One of this Information, WILLIAM A. BROWN, defendant herein, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461 any property, real or personal, which represents or is traceable to the gross receipts obtained, directly or indirectly, as a result of said violation.

15. If the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

DAVID C. WEISS  
United States Attorney

BY:   
Whitney C. Cloud  
Assistant United States Attorney

Dated: July 3, 2019

## DEFENDANT INFORMATION SHEET

TO: Clerk, U.S. District Court

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Felony

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Class A Misdemeanor

DEFENDANT: William A. Brown

☐

Indictment

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Information

DOB (Year Only) 1967

COUNTY OF OFFENSE:

New Castle

### OFFENSE(S) & CITATION(S):

### MAXIMUM PENALTY:

Count I – Wire Fraud, in violation of 18 U.S.C.  
§ 1343

Maximum 20 years imprisonment, a \$250,000 fine, 3  
years supervised release, and a \$100 special assessment

### INSTRUCTIONS

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Order to Produce for Arraignment  
on:

at 1:00 p.m.

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Issue Arrest Warrant upon signing of Order

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Issue Summons for Initial Appearance on: Change of Plea at

☐

Interpreter Needed

Language

### DEFENDANT INFORMATION

REDACTED

Whitney C. Cloud

Assistant United States Attorney